

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FRANCIS SANTIAGO,

Plaintiff,

vs.

GMAC MORTGAGE GROUP, INC., GMAC
RESIDENTIAL HOLDING CORP., and GMAC
MORTGAGE CORPORATION,

Defendants.

Civil Action No. 02-4048

**DECLARATION OF TIMOTHY G. BLOOD
IN SUPPORT OF MOTION FOR ATTORNEYS' FEES
AND REIMBURSEMENT OF EXPENSES ON BEHALF OF
LERACH COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP**

I, Timothy G. Blood, declare as follows:

1. I am an attorney and a member of the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP, 655 West Broadway, Suite 1900, San Diego, California 92101-3301. I am submitting this Declaration in support of Plaintiff's Counsel's application for an award of attorneys' fees from the settlement achieved for the Settlement Class in the above-captioned litigation, as well as the reimbursement of expenses reasonably incurred by my firm in connection with this litigation.

2. I am an attorney in good standing and duly licensed and admitted to the California State bar. The testimony set forth in this Declaration is based on my first-hand knowledge and/or an examination of my firm's files.

3. My firm's compensation for the services rendered on behalf of the Class is wholly contingent. Any fees and reimbursement of expenses will be limited to such amounts as approved by this Court.

4. My firm acted as one of the Plaintiff's Counsel in this class action. In serving as one of the Plaintiff's Counsel, my firm participated in activities resulting in the \$650,000.00 proposed settlement. These activities include conducting a pre-filing investigation, filing an initial complaint, negotiating with other Plaintiff's Counsel to coordinate the action brought by our client with other pending litigation, briefing Plaintiff's opposition to Defendants' motion to dismiss, participating in initial case management conferences and the formulation of a discovery plan, litigating this matter on appeal, reviewing discovery, participating in a continuing investigation of the claims and theories at issue, participating in the development of mediation strategies and formulating damage theories and proposals for allocation of settlement funds, preparing for and participating in mediation proceedings, consulting with co-counsel on settlement strategies and objectives, drafting and reviewing settlement documents, negotiating settlement terms, development of the plan of allocation, development of the claims procedures and design of the claim form, preparation of the motion for preliminary approval of the settlement, and participating in the administration of the settlement.

5. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the partners, other attorneys and professional support staff of my firm who were involved in this litigation, and the lodestar calculation based on my firm's current billing rates. For personnel who are no longer employed by my firm, the lodestar calculation is based upon the billing rates for such personnel in his or her final year of employment by my firm. The schedule was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm, which are available at the request of the Court. No time expended in connection with preparing this application for fees and reimbursement of expenses has been included in this request.

6. The hourly rates for the partners, attorneys, and professional support staff in my firm included in Exhibit 1 are the same as the regular current rates charged for their services in non-contingent matters and/or which have been accepted and approved in other class action litigation.

7. The total number of hours expended on this litigation by my firm is 32.75 hours. The total lodestar for my firm is \$17,261.25.

8. My firm's lodestar figures are based upon the firm's billing rates, which rates do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in my firm's billing rates.

9. As detailed in Exhibit 2, my firm has incurred a total of \$1,415.96 in unreimbursed expenses reasonably incurred in connection with the prosecution of this litigation.

10. The expenses incurred in this action by my firm are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials and represent an accurate recordation of the expenses incurred.

11. With respect to the standing of counsel in this case, attached hereto as Exhibit 3 is a brief biography of my firm and attorneys in my firm who were principally involved in this litigation.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 24th day of July, 2007, at San Diego, California.

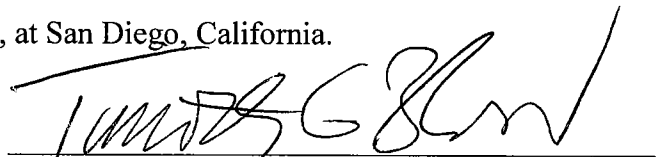

TIMOTHY G. BLOOD

EXHIBIT 1

Santiago v. GMAC Mortgage Group, Inc., et al., 02-4048

LERACH COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP

TIME REPORT

NAME	POSITION	HOURS	RATE	LODESTAR
Timothy G. Blood	Partner	27.25	\$585.00	\$15,941.25
Annie Hull	Paralegal	5.50	\$240.00	\$1,320.00
	TOTALS	32.75		\$17,261.25

EXHIBIT 2

Santiago v. GMAC Mortgage Group, Inc., et al., 02-4048

LERACH COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP

UNREIMBURSED EXPENSES REPORT

Inception through 05/11/07

Categories	Total
Legal Research	\$ 10.56
Meals, Hotels, & Transportation	1,365.70
In-House Photocopies	33.75
Telephone: Connect NY 11/29/06 Hearing	5.95
Total	\$ 1,415.96

EXHIBIT 3

FIRM RESUME AND BIOGRAPHIES

LERACH COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP

LERACH COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP ("Lerach Coughlin") is a 180-lawyer law firm with offices in San Diego, San Francisco, Los Angeles, New York, Boca Raton, Washington, D.C., Houston, Philadelphia and Seattle (www.lerachlaw.com). Lerach Coughlin is actively engaged in complex litigation, emphasizing securities, consumer, insurance, healthcare, human rights, employment discrimination and antitrust class actions. Lerach Coughlin's unparalleled experience and capabilities in these fields are based upon the talents of its attorneys who have successfully prosecuted thousands of class action lawsuits. As a result, Lerach Coughlin attorneys have been responsible for recoveries of more than \$45 billion.

This successful track record stems from our experienced attorneys, including many who left partnerships at other firms or came to Lerach Coughlin from federal, state and local law enforcement and regulatory agencies, including dozens of former federal prosecutors. Lerach Coughlin also includes more than 25 former federal (circuit and district) and state judicial clerks.

Lerach Coughlin currently represents more institutional investors in securities and corporate litigation – public and multi-employer funds – than any other firm in the United States.

TIMOTHY G. BLOOD graduated *cum laude* and with honors in Economics from Hobart College in 1987 and the National Law Center of George Washington University in 1990. He was elected to Phi Beta Kappa, Omicron Delta Epsilon (Economics) and the Moot Court Board (first year honors).

Mr. Blood focuses on consumer fraud and unfair competition litigation with a focus on actions brought by policyholders against life and property and casualty insurers for deceptive sales practices, racial discrimination and systematic failures in claims adjustment. Mr. Blood has been involved in a number of cases that have resulted in significant settlements, including *McNeil v. Am. Gen. Life & Accident Ins. Co.* (\$234 million), *Lee v. USLife Corp.* (\$148 million), *Garst v. Franklin Life Ins. Co.* (\$90.1 million), *In re Gen. Am. Sales Practices Litig.* (\$67 million), *Williams v. United Ins. Co. of Am.* (\$51.4 million); and *Sternberg v. Apple Computer, Inc.* (\$50 million).

Mr. Blood is also responsible for several precedent-setting appellate decisions, including *Lebrilla v. Farmers Group, Inc.*, 119 Cal. App. 4th 1070 (2004). Mr. Blood is a frequent lecturer on class action procedure and consumer fraud issues and is a member of the Board of Governors of the Consumer Attorneys of California.

Mr. Blood is admitted to practice in California and in the U.S. Courts of Appeals for the Fifth, Sixth, Eighth, Ninth and Eleventh Circuits and the U.S. District Courts for the Southern, Central, Eastern and Northern Districts of California. He is a member of the San Diego County and American Bar Associations, the State Bar of California, the Association of Business Trial Lawyers, the Association of Trial Lawyers of America and the Consumer Attorneys of California.